

Hearing Date: April 28, 2009 at 10:00 a.m.
Objection Deadline: April 21, 2009

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Counsel to Export Development Canada

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

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In re: : Chapter 11
: :
CIRCUIT CITY STORES, INC., et al., : Case No. 08-35653
: :
Debtors. :
: Jointly Administered
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**NOTICE OF MOTION AND NOTICE OF HEARING ON MOTION FOR
ALLOWANCE OF THE LATE FILED ADMINISTRATIVE EXPENSE CLAIM
OF EXPORT DEVELOPMENT CANADA**

PLEASE TAKE NOTICE that on April 8, 2009, Export Development Canada (“EDC”) filed a MOTION FOR ALLOWANCE OF THE LATE FILED ADMINISTRATIVE EXPENSE CLAIM OF EXPORT DEVELOPMENT CANADA (the “Motion”). The motion is attached for those receiving hard copies of the Motion as Exhibit A, however, Exhibit “A” is not attached due to its volume. Exhibit “A” has been filed on the Court’s PACER system. Any party that wishes to request a hard copy of Exhibit “A” can make such a request by contacting Ronald A. Clifford, Esq., at 4685 MacArthur Blvd., Suite 421, Newport Beach, CA 92660, by phone at (949) 260-0616, or by e-mail at rclifford@blakeleyllp.com.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. If you do not have an attorney, you may wish to consult one. Under Local Bankruptcy Rule 9013-1, unless a written response to the Motion is filed with the Clerk of the Court and served on the moving party, the trustee and those parties as required by the Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management and Administrative Procedures (entered on November 13, 2008 at Docket No. 130)(the "Case Management Order") no later than five (5) business days before the scheduled hearing date, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice of hearing. If you do not want the Court to approve the Motion or if you want the Court to consider your views on the Motion, then you or your attorney must:

- [X] File with the Court, either electronically or at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive it on or before April 21, 2009.**

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

- [X] Pursuant to the Case Management Order, you must also serve a copy of any written response and request for hearing by the foregoing date via electronic mail on the following: (i) the Core Group, which includes the Debtors, co-counsel to the Debtors, the Office of the United States Trustee, co-counsel for any committee, counsel the agents for the Debtors' pre-petition lenders, and counsel to the agents for the Debtors' post-petition lenders; (ii) the 2002 List; and (iii) those additional parties as required by the Case Management Order (all of which are defined in the Case Management Order), which can be found at www.kccllc.net/circuitcity.

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- [X] Attend a hearing before the Honorable Kevin Huennekens, United States Bankruptcy Judge, at 10:00 a.m. (Eastern Standard Time) on April 28, 2009 at the United States Bankruptcy Court, Room 5000, 701 East Broad Street, Richmond, Virginia 23219. If you or your attorney does not attend the hearing, the Court may grant the relief requested in the Motion. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief requested.

Dated: April 8, 2009

Respectfully submitted,

FULLERTON & KNOWLES, P.C.

By: /s/Richard I. Hutson
Richard I. Hutson, Esq.
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*Local Counsel for Export
Development Canada*

-and-

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*Counsel for Export Development
Canada*

Certificate of Service

I hereby certify that on April 8, 2009, a copy of the foregoing was filed electronic mail on the following: (i) the Core Group, which includes the Debtors, co-counsel to the Debtors, the Office of the United States Trustee, co-counsel for any committee, counsel to the agents for the Debtors' pre-petition lenders, and counsel to the agents for the Debtors' post-petition lenders; (ii) the 2002 List; and (iii) those additional parties as required by the Case Management Order (all of which are defined in the Case Management Order).

/s/ Ronald A. Clifford